

United States District Court
Southern District of Texas
FILED

MAR 12 2019

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF TEXAS
McALLEN DIVISION

David J. Bradley, Clerk

UNITED STATES OF AMERICA

v.

SELENE M. SUAREZ

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Criminal No. M-0128-S1

SUPERSEDING INDICTMENT**THE GRAND JURY CHARGES:****Counts One through Six**

From on or January 2013 to on or about May 2015, in the Southern District of Texas and within the jurisdiction of the Court, defendant,

SELENE M. SUAREZ

the defendant, as named below in each Count One through Six, knowingly and for the purpose of evading the reporting requirements of section 5313(a) of Title 31, United States Code, and the regulations promulgated thereunder, structured the following transactions with domestic financial institutions, and did so while violating another law of the United States.

Count One

Date of Deposit	Cash Deposit	Time	Bank and Branch Location	Teller #
01/30/2013	\$9,500.00	9:12:27 a.m.	Wells Fargo Bank 120 W Nolana St McAllen, Texas	U47425
01/30/2013	\$4,500.00	9:35:08 a.m.	Wells Fargo Bank 2808 W Trenton Rd. Edinburg, Texas	U02411
01/30/2013	\$5,000.00	9:35:08 a.m.	Wells Fargo Bank 2808 W Trenton Rd Edinburg, Texas	U02411

Count Two

Date of Deposit	Cash Deposit	Time	Bank and Branch Location	Teller # and/or initials
08/11/2014	\$8,000.00	4:00:17 p.m.	Wells Fargo Bank 1100 E Jackson Ave. McAllen, Texas	U288241
08/12/2014	\$7,000.00	9:26:18 a.m.	Wells Fargo Bank 120 W Nolana St McAllen, Texas	U308774
08/18/2014	\$7,500.00	3:12:17 p.m.	Wells Fargo Bank 120 W Nolana St McAllen, Texas	U350003

Count Three

Date of Deposit	Cash Deposit	Time	Bank and Branch Location	Teller # and/or initials
03/19/2015	\$8,000.00	Unknown	Inter National Bank 730 Nolana Ave McAllen, Texas	4404
03/24/2015	\$4,640.00	12:52 p.m.	Wells Fargo Bank 1100 E Jackson Ave McAllen, Texas	unknown

Count Four

Date of Deposit	Cash Deposit	Time	Bank and Branch Location	Teller # and/or initials
04/22/2015	\$5,000.00	11:54 a.m.	JP Morgan Chase 920 S Jackson Rd McAllen, Texas	5
04/22/2015	\$5,000.00	Unknown	Inter National Bank 1700 S 10 th St. McAllen, Texas	708

Count Five

Date of Deposit	Cash Deposit	Time	Branch Location	Teller # and/or initials
04/24/2015	\$5,000.00	3:16 p.m.	JP Morgan Chase 200 S 10 th St McAllen, Texas	50
04/30/2015	\$5,400.00	Unknown	Inter National Bank 730 Nolana Ave McAllen, Texas	4804

Count Six

Date of Deposit	Cash Deposit	Time	Branch Location	Teller # and/or initials
05/04/2015	\$6,300.00	9:53:10 a.m.	Inter National Bank 1705 N 23 rd St. McAllen, Texas	2502
05/04/2015	\$3,700.00	10:24 a.m.	JP Morgan Chase 200 S 10 th St McAllen, Texas	23

All in violation of Title 31, United States Code, Sections 5324(a)(3) and 5324(d) and Title 31, Code of Federal Regulations, Section 103.11

NOTICE OF CRIMINAL FORFEITURE

Pursuant to Title 31, United States Code, Section 5317(c)(1)(A), as a result of the commission of a violation of Title 31, United States Code, Section 5324 alleged in Count One through Five, notice is given that the defendant,

SELENE M. SUAREZ

shall forfeit to the United States of America—

(1) all property, real or personal, involved in the offense and any property traceable to such property. The property subject to forfeiture under Title 31, United States Code, Section 5317(c)(1)(A), includes, but is not limited to:

1. A sum of money, equal to \$84,240.00, which may be entered in the form of a forfeiture money judgment;

SUBSTITUTE ASSETS

In the event that the property that is subject to forfeiture, as a result of any act or omission of the defendant:

- (1) cannot be located upon the exercise of due diligence;
- (2) has been transferred or sold to, or deposited with, a third party;

- (3) has been placed beyond the jurisdiction of the Court;
- (4) has been substantially diminished in value; or,
- (5) has been commingled with other property which cannot be divided without difficulty;

it is the intent of the United States to seek forfeiture of any other property of the defendant up to the value of such property, pursuant to Title 21, United States Code, Section 853(p) as incorporated by Title 31, United States Code, Section 5317(c)(1)(B).

A TRUE BILL


FOREPERSON

RYAN K. PATRICK
UNITED STATES ATTORNEY


ASSISTANT UNITED STATES ATTORNEY